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February 12, 2021

**VIA CM/ECF**

Hon. Vernon S. Broderick, U.S.D.J.  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

**APPLICATION GRANTED  
SO ORDERED**

**VERNON S. BRODERICK  
U.S.D.J. 2/16/2021**

Re: *In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig., MDL No. 2542;*  
Master Docket No. 1:14-md-02542-VSB: Request to Seal

Dear Judge Broderick:

I write on behalf of Keurig, and in accordance with Your Honor's February 10, 2021 Order ("Order"), to request that the Court redact and seal limited portions of its Order, ECF 1238. Enclosed with this letter motion are Keurig's proposed redactions.

Keurig makes this sealing request to protect its attorney-client privileged information. The Order discusses two documents that each include a quote from the underlying January 8, 2010 privileged email exchange between Keurig outside counsel, a Keurig engineer, and Keurig in-house counsel. The Court has agreed with Magistrate Judge Cave's determination that the Wolf Greenfield Advice redacted from the Documents is "unquestionably protected by the attorney-client privilege," ECF 1238 at 5, and that this material qualifies for sealing, *id.* at 13. As such, Keurig seeks to protect this information from public disclosure.

Keurig's proposals are narrowly tailored to protect the confidentiality of the subject matter at issue, and it requests that this information remain sealed because it believes this material is the subject of reasonable efforts to maintain secrecy, could afford an advantage over others, and because their disclosure would cause material injury to Keurig. *See generally Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006). On balance, the privacy and business interest of Keurig outweigh the public's interest in accessing the material. Accordingly, Keurig requests that the Court seal limited portions of its Order, ECF 1238, as proposed by Keurig.

Respectfully submitted,

/s/ Wendelynn J. Newton

Wendelynn J. Newton